

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE
DISTRICT OF TENNESSEE**

Dr. Regina Jordan-Sodiq,)	Case No.: 3:25-cv-00288
Plaintiff)	Judge Eli Richardson Jury Demand
)	
v.)	
State of Tennessee et. al.,)	
Defendants and)	
Waste Management, Defendant)	

PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS

AND REQUEST FOR DISCLOSURE OF HEARING DATE & REGISTERED AGENT
INFORMATION**

COMES NOW Plaintiff, Dr. Regina Jordan-Sodiq, and **respectfully submits** this Opposition to Defendant's Motion to Dismiss, challenging Defendant's attempt to evade proper litigation through jurisdictional objections and procedural delays.

I. Procedural Deficiencies

Plaintiff states the following in support of this opposition:

1. **Failure to Notify of Hearing Date:** Defendant has filed a Motion to Dismiss but has not provided proper notification of the scheduled hearing date, **impeding Plaintiff's ability to submit a timely response.**
2. **Obstruction of Service:** Plaintiff has made **diligent efforts** to ascertain the registered agent's correct address for service; however, Defendant has failed to disclose definitive information, thereby **hindering proper legal procedure.**
3. **Lack of Transparency in Litigation:** Defendant's failure to disclose essential procedural details **constitutes undue delay**, potentially violating **principles of fairness and due process.**

II. Defendant's Business Presence Establishes Jurisdiction

Defendant's business operations and contractual agreements **unequivocally establish personal jurisdiction** within this venue:

1. **Ongoing Business Transactions:** Waste Connections of Tennessee, Inc. provides **commercial waste collection services** to Plaintiff and other residents within this jurisdiction (*See Exhibit A – Utility Bill*).
2. **Financial Engagement within the Forum:** Defendant directly receives payments from Plaintiff for services rendered, further reinforcing the legal nexus necessary for jurisdiction.
3. **Contradiction in Defendant’s Claim:** Defendant actively conducts business operations, enters contracts, and engages in financial transactions within this state, contradicting its jurisdictional objections.

III. Defendant’s Procedural Obstruction Requires Disclosure

Defendant’s actions **impede judicial efficiency** and hinder Plaintiff’s ability to litigate fairly:

1. Defendant has **failed to disclose the hearing date** for its Motion to Dismiss, **obstructing Plaintiff’s ability to respond effectively**.
2. Defendant’s **Business Entity Disclosure** lacks the registered agent’s full address, preventing proper **service of process**.
3. **Pattern of Harassment:** Defendant **engaged in targeted intimidation**, including **repeated anonymous calls to Plaintiff’s phone immediately before or after waste pickup services**, raising concerns of **coordinated harassment**.

IV. Defendant’s Procedural Obstruction and Harassment

Defendant’s actions extend beyond procedural misconduct—they demonstrate a **clear pattern of intimidation**:

1. **Coordinated Harassment:** Defendant has engaged in **repeated anonymous phone calls** to Plaintiff immediately before or after waste pickup services.
2. **Violation of Federal Stalking Laws:** Under **18 U.S. Code § 2261A**, harassment through **surveillance, unwanted communications, and intimidation** constitutes stalking, **warranting legal intervention**.
3. **Telephone Harassment Violations:** Repeated, anonymous calls intended to **intimidate or disrupt** may violate **state and federal laws** governing telephone harassment.
4. **Conspiracy & Coordinated Intimidation:** If multiple individuals or entities have **collaborated in targeting Plaintiff**, conspiracy laws **may apply** under statutes prohibiting **organized harassment efforts**.

V. Relief Requested

WHEREFORE, Plaintiff **respectfully requests** this Court to:

- **Deny Defendant’s Motion to Dismiss**, as jurisdiction is properly established.
- **Compel Defendant to disclose the hearing date, time, and courtroom assignment** for its pending Motion to Dismiss.
- **Require Defendant to provide the full registered agent’s address** for proper service.

- Consider Judicial Oversight of Defendant's harassment tactics.
- Grant any further relief this Court deems just and proper.

VI. Defendant's Procedural Conduct Warrants Judicial Oversight

Defendant's failure to disclose the hearing date and registered agent's address supports the need for judicial review:

4. Defendant has obstructed Plaintiff's ability to effectively litigate, raising concerns about bad-faith procedural tactics.
5. These actions do not justify dismissal with prejudice—instead, they highlight a pattern of procedural obstruction.
6. If dismissal were ever considered, it should be without prejudice, allowing Plaintiff an opportunity to correct technical concerns.

VII. Relief Requested

Plaintiff respectfully requests this Court to:

- Deny Defendant's Motion to Dismiss with prejudice, as procedural concerns do not warrant permanent dismissal.
- Uphold Plaintiff's right to amend or correct any procedural issues rather than barring litigation.
- Grant any further relief this Court deems just and equitable.

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of May, 2025, a true and correct copy of Plaintiff's Response in Opposition to Defendants' Motion to Dismiss and Motion to Compel Disclosure of Hearing Date and Registered Agent Information, along with accompanying exhibits, was served via electronic filing upon the following:

Defendants' Counsel: Baker, Donelson, Bearman, Caldwell & Berkowitz, PC and Megison M. Hancock at email: mhancock@bakerdonelson.com

Pursuant to the Tennessee Rules of Civil Procedure, electronic service of this filing is deemed proper and effective.

Submitted this 5th day of May, 2025
Dr. Regina Jordan-Sodiq, Pro Se Plaintiff
1757 Autumnwood Blvd Clarksville, TN 37042

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

DR
Regina Jordan-Sodig)

Plaintiff(s),

v.

State of Tennessee et.al.)

Defendant(s).

and Waste Management, Defendant

Case Number 3:25-CV-00288

Judge Judge Eli Richardson

Magistrate Judge _____

Jury Demand

Plaintiff Opposition to Defendant's Motion
(Type of Pleading) to Dismiss

① Exhibits: Exhibit A is the utility bill
exhibit A-1 and exhibit A-2

①

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the (pleading)
has been served on:

(Name)
(Address)
(Address)

Kimberly S. Veirs Dismiss
214 Church Street
Suite 3300, Indianapolis IN 37203

(Name)
(Address)
(Address)

Katherine R. Rogers
701 7th Avenue, N.E.
202 Second Ave N, Suite 2000
Nashville TN 37201
Stanley M. J. Howell
309 E 9th St
Clarksville TN 37040

(Name)
(Address)
(Address)

Jason W. Collier
701 L Street CLP
701 Commerce Street
701 7th Avenue, Nashville TN 37203
Tracy P. Knight
701 7th Street
Clarksville TN 37040

(Name)
(Address)
(Address)

Christopher Murphy
Rodger Snow, P. (Matthew Building)
1320 Adams St, Suite 1400

(Name)
(Address)
(Address)

Kirch Indiana
600 Peachtree Street, NE, Suite
Atlanta GA 30308

(Name)
(Address)
(Address)

John H. Danner
Office 3000 CLP
150 3rd Avenue South, Suite 1600

(Name)
(Address)
(Address)

Christopher J. Scott
215 1/2 West End Ave, Suite 1100
Nashville TN 37203

on the

day of

24

Continue -

Signature

②

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the (pleading) Response to Motion to
has been served on:

DISMISS

(Name)

IN. Scott Sims

(Address)

3102 West End Avenue, Suite 1100

(Address)

Nashville, TN 37203

(Name)

(Address)

(Name)

(Address)

(Address)

5th

May

2025

Scot 3

DR

~~Signature~~

(Signature)

Regina Jordan Sodig

(Print Name)

1757 Autumnwood Blvd

Clarksville TN 37042

(931) 561-2546

(Address & Telephone Number, if any)

(4)

Queen City Disposal - Scheduled Automatic Payment
From:olp6034@wcnx.org
To:g4818@yahoo.com
Date:Wednesday, March 19, 2025 at 07:42 AM CDT

Exhibit A2

Message Body



Hello regina JORDAN,

Your Automatic Payment for account 6034-511047 has been scheduled.

Payment Date: 03/19/2025

Payment Amount: \$83.05

Payment Account: *****1695

If you would like to view your invoices, please log in to [My Account Portal](#).

If you have any questions or concerns, please call us at 931-552-3010.

We appreciate the opportunity to manage your waste disposal needs.

Sincerely,
Queen City Disposal Customer Care Team

Automatic Payment

online